

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR  
ADMISSIONS, INC.,**

**Plaintiff,**

**v.**

**UNIVERSITY OF NORTH  
CAROLINA et al.,**

**Defendants.**

**DEFENDANTS' SECOND  
SUPPLEMENTAL INITIAL  
DISCLOSURES**

Pursuant to Fed. R. Civ. P. 26(a)(1), Defendants the University of North Carolina et al. hereby supplement their Initial Disclosures submitted May 20, 2015 and Supplemental Disclosures submitted September 28, 2016 (collectively, the “Initial Disclosures”). Defendants state that discovery in this case remains ongoing and they reserve the right to further supplement and amend their disclosures as necessary and appropriate, including to add additional witnesses and documents.

**I. Individuals with Discoverable Information Defendants May Use to Support Their Defenses**

In addition to the individuals disclosed in Defendants’ Initial Disclosures, Defendants may use the following individuals to support their defenses:

**A. Individuals Associated with Defendants**

**University Faculty and Staff**

1. Nilay Argon, Associate Professor of Statistics and Operations Research

c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; why a diverse student body is critical to helping the University achieve its educational, research, and service mission; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

2. Fitz Brundage, History Department Chair and William B. Umstead Distinguished Professor of History

c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; and why a diverse student body is critical to helping the University achieve its educational, research, and service mission.

3. Maribel Carrion, Information Technology Services Senior Director

c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body to students at the University; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

4. Paul Cuadros, Admissions Advisory Committee member and Associate Professor of Journalism

c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; why a diverse student body is critical to helping the University achieve its educational, research, and service mission; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and how University admissions contributes to these educational benefits.

5. Joe DeSimone, Chancellor's Eminent Professor of Chemistry  
c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; why a diverse student body is critical to helping the University achieve its educational, research, and service mission; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and the importance of a diverse undergraduate student body to potential employers of University students.

6. Emil Kang, Executive Director for the Arts and Professor of the Practice  
c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; why a diverse student body is critical to helping the University achieve its educational, research, and service mission; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

7. Patricia McAnany, Kenan Eminent Professor of Anthropology

c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; why a diverse student body is critical to helping the University achieve its educational, research, and service mission; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

8. Viji Sathy, Senior Lecturer of Psychology and Neuroscience.

c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; why a diverse student body is critical to helping the University achieve its educational, research, and service mission; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

9. Louise Toppin, Music Department Chair and Professor of Music

c/o Defendants' Counsel

Information regarding experiences with diversity and the importance of diversity at the University; the educational benefits of diversity; how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; why a diverse student body is critical to helping the University achieve its educational, research, and service mission; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

#### **University Students and Alumni**

1. Ezra Baeli-Wang

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and the importance of a diverse student body at the University.

2. Rye Barcott

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to potential employers of University students.

3. Chelsea Barnes

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body to students at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

4. Melody Barnes

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and

the importance of a diverse undergraduate student body to potential employers of University students.

5. Taylor Bates

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

6. Ron Bilbao

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and the importance of a diverse undergraduate student body to potential employers of University students.

7. Regan Buchanan

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

8. Gabe Chess

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

9. Mary Cooper

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

10. Marty Davidson

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

11. Lauren Eaves

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

12. Laura Gamo

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

13. Rachel Gogal

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

14. Teddy Gonzalez

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

15. Peter Henry

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.



16. Atrayus Goode

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

17. Brittany Hunt

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

18. Donovan Livingston

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

19. Katy Lucci

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the

University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

20. Kendall Luton

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

21. Karol Mason

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and the importance of a diverse undergraduate student body to potential employers of University students.

22. Ashley McMillan

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

23. Merrick Osborne

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

24. Michael Ortiz

c/o Defendants' Counsel

Information regarding the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and the importance of a diverse undergraduate student body to potential employers of University students.

25. Jordan Peterkin

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

26. Cecilia Polanco

c/o Proposed Intervenor's Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

27. Micah Poulson

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

28. Vishal Reddy

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

29. Neils Ribeiro-Yemofio

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

30. Jonathan Rich

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the

University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

31. Shruti Shah

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

32. Stick Williams

c/o Defendants' Counsel

Information regarding experiences with diversity at the University; the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body at the University; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University; and the importance of a diverse undergraduate student body to potential employers of University students.

33. Camille Wilson

c/o Defendants' Counsel

Information regarding the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; and the importance of a diverse student body at the University; the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

34. Anne Zhou

c/o Defendants' Counsel

Information regarding the educational benefits of diversity; how a diverse student body enriches the student experience and yields educational benefits; the importance of a diverse student body to students at the University; and the importance of a diverse undergraduate student body to assist the University in creating future leaders and preparing students for careers and other opportunities, and life beyond the University.

**Other University Officers, Faculty, Staff, and Students**

35. Current and former members of the University Board of Trustees with knowledge of the educational benefits of diversity and knowledge of the University's mission, history, and commitment to diversity. Defendants will supplement its disclosures when the identity of these witnesses is ascertained.
36. Current and former University faculty members with knowledge of the educational benefits of diversity; knowledge regarding how a diverse undergraduate student body and environment yields educational benefits and complements and enriches academic discourse and work; and why a diverse student body is critical to helping the University achieve its educational, research, and service mission. Defendants will supplement its disclosures when the identity of these witnesses is ascertained.
37. Current and former University students with knowledge of the educational benefits of diversity; knowledge regarding how a diverse student body enriches the student experience and yields educational benefits; and the importance of a diverse student body to students at the University. Defendants will supplement its disclosures when the identity of these witnesses is ascertained.
38. Current and former University administrators, faculty members, staff, alumni, and friends of the University with information regarding the importance of a diverse undergraduate student body to assist the University in its mission to create future leaders and prepare students for professional, business, service, military and other opportunities and the importance of a diverse undergraduate student body to potential employers of University students. Defendants will supplement its disclosures when the identity of these witnesses is ascertained.
39. Current and former University administrators, faculty members, and staff with information regarding the financial aid and scholarships

provided by the University to its undergraduate students, including, but not limited to the Carolina Covenant program. Defendants will supplement its disclosures when the identity of these witnesses is ascertained.

40. Current and former University administrators, faculty, staff, students, and friends of the University with information Defendants pertinent to the claims and defenses who have not yet been discovered.

## **II. Categories and Location of Documents Defendants May Use to Support Their Defenses**

In addition to the categories of documents identified in Defendants' Initial Disclosures, Defendants may use the following categories of documents to support their defenses:

1. Documents related to the importance of diversity to the University's mission;
2. Documents related to the University's consideration of race-neutral admission alternatives;
3. Documents related to the University's identification of and institutional assessment of the educational benefits of diversity; and
4. Information about diversity and the educational benefits of diversity available on the University's website.

All documents are believed to be at the University and will be made available upon request to Defendants' counsel.

Submitted January 11, 2017

/s/ Michael Scudder  
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ROY COOPER  
Attorney General

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